

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CR 4:22-cr-40028

Plaintiff,

REDACTED INDICTMENT

v.

Production of Child Pornography

JAYDEN KUSIEK WOLF,

18 U.S.C. §§ 2251(a) and 2251(e)

Defendant.

The Grand Jury charges:

COUNT 1

On or about between May 25, 2021, and July 7, 2021, in the District of South Dakota, the Defendant, Jayden Kusiek Wolf, did knowingly employ, use, persuade, induce, entice, and coerce a minor, under the age of 18, to wit: "minor female A," whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depiction would be transported in interstate or foreign commerce or mailed, and such visual depiction would be produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, including by computer, and attempted to do so, all in violation of 18 U.S.C. §§ 2251(a) and 2251(e).

COUNT 2

On or about between May 25, 2021, and July 7, 2021, in the District of South Dakota, the Defendant, Jayden Kusiek Wolf, did knowingly employ, use,

persuade, induce, entice, and coerce a minor, under the age of 18, to wit: "minor female B," whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depiction would be transported in interstate or foreign commerce or mailed, and such visual depiction would be produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, including by computer, and attempted to do so, all in violation of 18 U.S.C. §§ 2251(a) and 2251(e).

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to 18 U.S.C. § 2253.

2. If convicted of an offense set forth above, Jayden Kusiek Wolf, the Defendant herein, shall forfeit to the United States any and all materials or property used or intended to be used in the possession, receipt, distribution and production of child pornography. Such property includes, but is not limited to:

1. iPhone 12.

A TRUE BILL:

NAME REDACTED

Foreperson

DENNIS R. HOLMES
United States Attorney

By _____
